

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Ernest Benjamin,
Petitioner

v.

Iuis Spencer,
Respondent

PETITIONER'S AFFIDAVIT IN SUPPORT OF
MOTION FOR APPOINTMENT OF COUNSEL

I, Ernest Benjamin, on oath states the following facts
on personal knowledge:

1) I am the petitioner in the above matter and submit
this affidavit in support of my motion for appointment of
counsel;

2) I am presently serving a sentence of Life Without
the Possibility of Parole at Massachusetts Correctional
Institution at Norfolk;

3) At all times during trial and on direct appeal I was
represented by Court appointed counsel;

4) I lack a basic knowledge and understanding of legal
proceedings which includes the ability to draft legal docu-
ments;

5) I have previously filed a State motion for new trial
and appeal of such pro se;

6) I have submitted numerous substantial and complex
legal and factual issues, including ineffective assistance of
counsel;